

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

DROPBOX, INC.,

*Plaintiff/ Counterclaim  
Defendant,*

v.

MOTION OFFENSE, LLC,

*Defendant / Counterclaim  
Plaintiff.*

MOTION OFFENSE, LLC,

*Plaintiff,*

v.

DROPBOX, INC.,

*Defendant.*

**Civil Action No. 6:20-cv-00251-ADA**

**JURY TRIAL DEMANDED**

**Civil Action No. 6:21-cv-00758-ADA**

**JURY TRIAL DEMANDED**

**JOINT PROPOSED JURY VERDICT FORM**

Motion Offense, LLC and Dropbox, Inc. jointly submit this proposed jury verdict form, incorporating the guidance received from the Court during an informal jury charge conference. The parties stipulate and agree that any objection to the verdict form, as stated by a party in its most recent filing with the pretrial order,<sup>1</sup> is preserved and not waived by the filing of this Joint Proposed Jury Verdict Form that incorporates guidance from the Court. The proposed verdict form begins on the next page.

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<sup>1</sup> See Dkt. 321-12 and 321-14.

When answering the following questions and filling out this Verdict Form, please follow the directions provided throughout the Form. Your answer to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Jury Instructions. Please refer to the Jury Instructions if you are unsure about the meaning or usage of any legal term that appears in the questions below.

As used here, “Motion Offense” means Motion Offense LLC and “Dropbox” means “Dropbox Inc.” As used here, “158 Patent” refers to U.S. Patent No. 10,013,158, “052 Patent” refers to U.S. Patent No. 10,021,052, “548 Patent” refers to U.S. Patent No. 10,587,548 and “215 Patent” refers to U.S. Patent No. 11,044,215.

We, the jury, unanimously agree to the answers to the following questions, and return them under the instructions of this Court as our verdict in this case.

**I. QUESTIONS OF INFRINGEMENT**

**Please answer Question 1 separately for each asserted patent claim.**

<p><b>Q1. For each asserted patent claim, has Motion Offense proven by a preponderance of the evidence that Dropbox has infringed?</b></p> <p><b>Please answer in each cell with “Yes” (for Motion Offense) or “No” (for Dropbox).</b></p>	
'158 patent – Claim 3	
'158 patent – Claim 6	
'158 patent – Claim 14	
'052 patent – Claim 12	
'052 patent – Claim 20	
'052 patent – Claim 27	
'548 patent – Claim 46	
'215 patent – Claim 18	

**II. QUESTIONS OF PRIORITY DATE**

**ANSWER QUESTION 2 FOR EACH ASSERTED CLAIM OF THE '158 PATENT AND EACH ASSERTED CLAIM OF THE '052 PATENT.**

<p><b>Q2. For each asserted patent claim, has Motion Offense proven by a preponderance of the evidence that the claim is entitled to a priority date of September 25, 2012?</b></p> <p><b>Please answer in each cell with “Yes” (for Motion Offense) or “No” (for Dropbox).</b></p>	
'158 patent – Claim 3	
'158 patent – Claim 6	
'158 patent – Claim 14	
'052 patent – Claim 12	
'052 patent – Claim 20	
'052 patent – Claim 27	

**ANSWER QUESTION 2 FOR CLAIM 46 OF THE '548 PATENT AND/OR CLAIM 18 OF THE '215 PATENT ONLY IF YOU ANSWERED “YES” FOR THAT CLAIM IN QUESTION 1.**

<p><b>Q2. For each asserted patent claim, has Motion Offense proven by a preponderance of the evidence that the claim is entitled to a priority date of September 25, 2012??</b></p> <p><b>Please answer in each cell with “Yes” (for Motion Offense) or “No” (for Dropbox).</b></p>	
'548 patent – Claim 46	
'215 patent – Claim 18	

**III. QUESTIONS OF INVALIDITY**

**ANSWER QUESTION 3 FOR EACH ASSERTED CLAIM OF THE '158 PATENT AND EACH ASSERTED CLAIM OF THE '052 PATENT.**

<p><b>Q3. For each asserted patent claim, has Dropbox proven by clear and convincing evidence that the claim is invalid as anticipated or obvious in light of the prior art?</b></p> <p><b>Please answer in each cell with “Yes” (for Dropbox) or “No” (for Motion Offense).</b></p>	
'158 patent – Claim 3	
'158 patent – Claim 6	
'158 patent – Claim 14	
'052 patent – Claim 12	
'052 patent – Claim 20	
'052 patent – Claim 27	

**ANSWER QUESTION 3 FOR CLAIM 46 OF THE '548 PATENT AND/OR CLAIM 18 OF THE '215 PATENT ONLY IF YOU ANSWERED “YES” FOR THAT CLAIM IN QUESTION 1.**

<p><b>Q3. For each asserted patent claim, has Dropbox proven by clear and convincing evidence that the claim is invalid as anticipated or obvious in light of the prior art?</b></p> <p><b>Please answer in each cell with “Yes” (for Dropbox) or “No” (for Motion Offense).</b></p>	
'548 patent – Claim 46	
'215 patent – Claim 18	

**IV. QUESTION OF DAMAGES (ONLY IF APPLICABLE)**

**IF YOU ANSWERED “NO” FOR ALL CLAIMS IN QUESTION 1 (NOT INFRINGED), DO NOT ANSWER QUESTION 4. PROCEED DIRECTLY TO THE FINAL SIGNATURE PAGE.**

**IF YOU ANSWERED “YES” (INFRINGED) FOR AT LEAST ONE CLAIM IN QUESTION 1 AND YOU FOUND ANY INFRINGED CLAIM NOT INVALID (“NO” IN QUESTION 3), THEN PROCEED TO QUESTION 4.**

**Q4. What is the amount of reasonable royalty damages through June 30, 2022, that Motion Offense has proved by a preponderance of the evidence as a result of the infringement you found in Question No. 1?**

**Amount of Reasonable Royalty Damages: \$\_\_\_\_\_**

**PROCEED TO THE FINAL SIGNATURE PAGE.**

**FINAL PAGE OF JURY VERDICT FORM**

You have now reached the end of the Verdict Form and should review it to ensure it accurately reflects your **unanimous** determinations. After you have satisfied that your unanimous answers are correctly reflected above, your Jury Foreperson should then sign and date this Verdict Form in the spaces below. Once that is done, notify the Court Security Officer that you have reached a verdict.

SIGNED this \_\_\_\_ day of May 2023.

\_\_\_\_\_  
JURY FOREPERSON

May 19, 2023

/s/ Donald Puckett

Timothy Devlin (DE Bar No. 4241)  
Derek Dahlgren (*pro hac vice*)  
Alex Chan (Texas Bar No.  
24108051)  
Donald Puckett (Texas Bar No.  
24013358)  
Srikant Cheruvu (*pro hac vice*)  
Andrew Sherman (*pro hac vice*)  
Jedidiah Phillips (*pro hac vice*)  
**DEVLIN LAW FIRM LLC**  
1526 Gilpin Ave.,  
Wilmington, DE 19806  
Telephone: (302) 449-9010  
tdevlin@devlinlawfirm.com  
ddahlgren@devlinlawfirm.com  
achan@devlinlawfirm.com  
dpuckett@devlinlawfirm.com  
scheruvu@devlinlawfirm.com  
asherman@devlinlawfirm.com  
jphillips@devlinlawfirm.com

*Attorneys for Motion Offense, LLC*

Respectfully submitted,

/s/ Gregory H. Lantier

Kelly Ransom  
Texas State Bar No. 24109427  
**KELLY HART & HALLMAN LLP**  
303 Colorado, Suite 2000  
Austin, Texas 78701  
Tel: (512) 495-6464  
Kelly.ransom@kellyhart.com

Gregory H. Lantier  
Amanda L. Major (*pro hac vice*)  
**WILMER CUTLER PICKERING  
HALE & DORR LLP**  
2100 Pennsylvania Avenue  
Washington DC 20037  
Tel: (202) 663-6327  
Tel: (202) 663-6304  
gregory.lantier@wilmerhale.com  
amanda.major@wilmerhale.com

Liv Herriot  
**WILMER CUTLER PICKERING  
HALE & DORR LLP**  
2600 El Camino Real,  
Suite 400 Palo Alto,  
California 94306 Tel:  
(650) 858-6138  
liv.herriot@wilmerhale.com

Makenzi G. Herbst (*pro hac  
vice*)  
Rauvin A. Johl (*pro hac  
vice*)  
Jeannette Leopold (*pro  
hac vice*)  
**WILMER CUTLER PICKERING  
HALE & DORR LLP**  
60 State Street  
Boston, MA 02109  
Tel: (617) 526-6171  
Tel: (617) 526-6104  
Tel: (617) 526-6109  
makenzi.herbst@wilmerhale.com  
rauvin.johl@wilmerhale.com  
jeannette.leopold@wilmerhale.com

*Attorneys for Dropbox, Inc.*



**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record are being served with a copy of the foregoing document via electronic mail on May 19, 2023.

/s/ Kelly Ransom  
Kelly Ransom